

IN THE UNITED STATE DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

JOHN DOE,

Petitioner/Judgment Creditor

Case No.: 15 CV 8652-LTS
Judge Laura Taylor Swain

EJERCITO DE LIBERACION NACIONAL (“ELN”),
et al.,

Defendants/Judgment Debtors
and

JPMORGAN CHASE BANK, N.A., and

Respondent,

JPMORGAN CHASE BANK, N.A

Third-Party Petitioner,
v.

KEITH STANSELL, et al.,

Third Party Respondents.

**NOTICE OF THIRD PARTY RESPONDENTS’ MOTION TO VACATE
PETITIONER JOHN DOE’S DEFAULT JUDGMENT AS VOID FOR
LACK OF SUBJECT MATTER JURISDICTION**

PLEASE TAKE NOTICE that, upon the Motion to Vacate Petitioner John Doe’s Default Judgment as Void for Lack of Subject Matter Jurisdiction (the “Motion to Vacate”), an application will be made by Third Party Respondents/Counterclaimants Keith Stansell, Marc Gonsalves, Thomas Howes, Judith Janis, Christopher Janis, Greer Janis, Michael Janis and Jonathan Janis (“Stansell Respondents”), pursuant to Fed. R.Civ.P. 60(b)(4), to the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, on a date to be determined, for an Order as requested in the Motion to Vacate, and such other relief as the Court deems just and proper.

The undersigned counsel has previously conferred with counsel for John Doe who oppose the relief requested in the Motion to Vacate.

Respectfully submitted December 31, 2015

/s/ Tony Korvick
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 31, 2015, I served the foregoing via First Class International Mail, or First Class U.S. Mail, to the following persons who are not believed to have received CM/ECF service upon filing:

NONE

By: /s/ Tony Korvick
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